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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL  
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF MARY PLETCHER  
RICE**

1 I, Mary Pletcher Rice, declare, pursuant to 28 U.S.C. § 1746, as follows:

- 2
- 3 1. I am the Acting Principal Deputy Assistant Secretary for Administration within Departmental
- 4 Administration at the United States Department of Agriculture (“USDA” or “Department”)
- 5 headquartered in Washington, D.C. I make this Declaration based on my own personal
- 6 knowledge, on information contained in the records of USDA, or on information provided to
- 7 me by USDA employees. I have served in this position since January 31, 2025, and I have
- 8 been employed at USDA since 2018. I submitted previous declarations in this matter and
- 9 rely on and incorporate my prior declaration testimony in making this declaration.
- 10
- 11 2. In my role at USDA, I currently oversee the Department’s Office of Human Resources
- 12 Management and I have purview over USDA subagencies’ Chief Operating Officers and
- 13 Human Resources Offices.
- 14
- 15 3. USDA reinstated and notified the Affected Probationary Employees to the pay status they
- 16 were in prior to their terminations. The Affected Probationary Employees who are in pay
- 17 status were initially placed on administrative leave as part of the phased plan to return the
- 18 employees to work.
- 19
- 20 4. Given the large number of Affected Probationary Employees being reinstated, USDA is
- 21 simultaneously developing and implementing enhanced procedures and tracking the
- 22 Department’s progress in returning the Affected Probationary Employees to full duty status.
- 23 For example, USDA administered an electronic survey through which Affected Probationary
- 24 Employees can indicate whether they elect to return to full duty status or whether they
- 25 decline to return to full duty status. As the tracking system is being developed, some of the
- 26 data is being input manually by Human Resources personnel and reflecting a more
- 27 comprehensive and detailed perspective of this multi-faceted undertaking. USDA is
- 28

1 providing this compliance update based in part on this dynamic data set. USDA is also using  
2 timekeeping data to ascertain which Affected Probationary Employees have returned to full  
3 duty status (returned to work) and which Affected Probationary Employees remain on  
4 administrative leave.

- 5 5. Approximately 4,633 Affected Probationary Employees have been returned to full duty status  
6 or have a confirmed date on which they will return to full duty status.
- 7 6. Human Resources personnel continue to try to reach all affected employees by email and  
8 telephone to confirm their elections regarding the return to full duty status and, for those  
9 employees who elect to return to full duty status, to continue to implement USDA's phased  
10 plan to return the Affected Probationary Employees to full duty status. The phased plan  
11 considers an employee's need to access, and availability of, information technology and other  
12 equipment; Lincpasses (badges); systems credentials; workstation readiness; and safety and  
13 security of facilities. USDA is continuously receiving updates and information from the  
14 people in the group of Affected Probationary Employees, via the survey and other modes of  
15 communication, regarding the offer to return to full duty status.  
16  
17  
18  
19

20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
21 and correct.  
22

23 Dated: April 7, 2025

24 **MARY RICE**

Digitally signed by  
MARY RICE  
Date: 2025.04.07  
14:49:17 -04'00'

25  
26 MARY PLETCHER RICE  
27  
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